

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KIMBERLY HUDSON-BRYANT, on behalf of himself and others similarly situated,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Misc. Case No. 2:25-mc-00038
	:	
CHASE DATA CORP.	:	
	:	
Non-Party Subpoena Recipient.	:	

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KIMBERLY HUDSON-BRYANT, on behalf of himself and others similarly situated,	:	Underlying Action Pending in the U.S. Southern District of Texas
	:	
Plaintiff	:	
	:	Case No. 4:25-CV-1245
v.	:	
	:	
SCHNEIDER WALLACE COTTRELL	:	
KONECKY WOTKYNS LLP	:	
	:	
Defendant.	:	

**Plaintiff Kimberly Hudson-Bryant's  
Notice of Non-Opposition to Motion to Compel  
Production of Documents Pursuant to Rule 45 Subpoena**

Plaintiff Kimberly Hudson-Bryant respectfully notes that no objection or otherwise has been filed to the Plaintiff's Miscellaneous Case Motion to Compel. Third Party Chase Data Corp. filed no response to the motion, despite being personally served on July 7, 2025 (ECF 2). Plaintiff therefore respectfully requests that the Court grant the Plaintiff's Motion to Compel as unopposed and award the costs of this proceeding as well as Plaintiff's attorneys' fees as against Dialpad, Inc., as contemplated by Rule 45(d)(1), with Plaintiff's counsel to submit a fee motion for the Court's consideration and approval within 30 days.

PLAINTIFF,  
By her attorneys

Dated: July 30, 2025

/s/ Andrew Roman Perrong  
Andrew Roman Perrong, Esq.  
Perrong Law LLC  
2657 Mount Carmel Avenue  
Glenside, Pennsylvania 19038  
Phone: 215-225-5529 (CALL-LAW)  
Facsimile: 888-329-0305  
a@perronglaw.com

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 30, 2025, the foregoing was served via electronic mail on counsel for the Defendant in the underlying action.

July 30, 2025

/s/ Andrew Roman Perrong  
Andrew Roman Perrong, Esq.  
Perrong Law LLC  
2657 Mount Carmel Avenue  
Glenside, Pennsylvania 19038  
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a@perronglaw.com